

Arizona Public Service Company

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October 15, 1984  
ANPP-30853-TDS/TRB

REGION VISE

U. S. Nuclear Regulatory Commission  
Region V  
Creekside Oaks Office Park  
1450 Maria Lane - Suite 210  
Walnut Creek, California 94596-5368

Attention: Mr. T. W. Bishop, Director  
Division of Reactor Safety and Projects

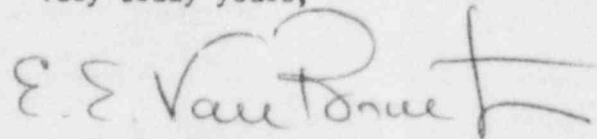
Subject: Final Report - DER 84-09  
A 50.55(e) Reportable Condition Relating To CAD Welding For  
Cathodic Protection Ground Connection.  
File: 84-019-026; D.4.33.2

- Reference: A) Telephone Conversation between R. Dodds and T. Bradish on  
February 19, 1984  
B) ANPP-29142, dated March 23, 1984 (Interim Report)  
C) ANPP-29383, dated April 30, 1984 (Time Extension)  
D) ANPP-29647, dated June 4, 1984 (Time Extension)  
E) ANPP-30060, dated July 27, 1984 (Time Extension)  
F) ANPP-30351, dated August 29, 1984 (Time Extension)  
G) ANPP-30548, dated September 18, 1984 (Time Extension)  
H) ANPP-30876, dated October 10, 1984 (Time Extension)

Dear Sir:

Attached is our final written report of the deficiency referenced above,  
which has been determined to be Not Reportable under the requirements of  
10CFR50.55(e).

Very truly yours,



E. E. Van Brunt, Jr.  
APS Vice President  
Nuclear Production  
ANPP Project Director

EEVB/TRB/nj  
Attachment

cc: See Page Two

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Mr. T. W. Bishop  
DER 84-09  
Page Two

cc: Richard DeYoung, Director  
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Washington, D. C. 20555

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FINAL REPORT - DER 84-09  
DEFICIENCY EVALUATION 50.55(e)  
ARIZONA PUBLIC SERVICE COMPANY (APS)  
PVNGS UNIT 2

I. Description of Deficiency

Eight cad welds, for cathodic protection ground connections, were made on ASME Section III piping (2" and 2-1/2" buried diesel fuel lines for the standby diesel generators) without a qualified welding procedure or any welding documentation. A review of this condition has indicated that it falls within the scope of ASME Code Case N-328.

II. Analysis of Safety Implications

Since all the other conditions of ASME Code Case N-328 were met for the cad welding described above, the Welding Procedure Specification which was issued for the corrective action applies retroactively to it.

This condition is evaluated as not reportable under 10CFR50.55(e) and/or Part 21; since, if left uncorrected, it would not pose a significant safety hazard.

III. Corrective Action

- A. An approved Welding Procedure Specification (WPS PI-THERMIT, Rev. 0, March 9, 1984) has now been qualified to ASME Code Case N-328, Section III, Division 1, Classes 2 and 3. This WPS will be used in performing all future cad welds to carbon steel (PI) pipe.
- B. Case N-328 of ASME Boiler and Pressure Vessel Code, Section III, Division 1 (Thermit Brazing or Welding of Nonstructural Attachments) is being referenced in the Design Criteria Manual and also included in the FSAR (Reference SAR Change Notice 1173 and Design Criteria Request No. 872).
- C. All eight subject cad welds shall be inspected to the acceptance criteria of Visual Examination Procedure VE-BPC-1 (latest revision), referenced in Form 84. Form 84 will be revised to include the requirement that all cad welds are to be inspected in accordance with Procedure VE-BPC-1. These 8 cad welds are the only such brazed joints to have occurred on ASME Section III piping to date.